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December 14, 2016

VIA FAX (718-613-2546) AND ECF

The Honorable Nicholas G. Garaufis
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. BDK Mailing GMBH, et al.*, 16 Civ. 5264 (NGG)

Dear Judge Garaufis:

We represent six defendants in the above-captioned matter: BDK Mailing GMBH, Mailing Force Pte. Ltd., Only Three Pte. Ltd., Chantal Seguy, Marion Elchlepp, and Aurora Jouffroy-Brandtner (the "BDK Defendants"). With the consent of all parties, we write to jointly request a 60-day adjournment of the currently scheduled dates to allow additional time for the parties to continue settlement negotiations.

The Court has granted two prior consent motions for adjournment by some of the parties (Dkts. 15, 20), a request by certain BDK Defendants to extend their time to answer or respond to the complaint (Dkt. 35), and a consent motion for adjournment by all of the parties, which set forth the dates in the current Scheduling Order (Dkt. 37). With the consent of all parties, we respectfully request that those dates be adjourned as follows:

1. The deadline for Defendants to file and serve any opposition to the pending application for a preliminary injunction is extended from 5:00 p.m. on December 14, 2016, to **5:00 p.m. on February 13, 2017**;
2. The deadline for the United States to file and serve any reply in further support of the pending application for a preliminary injunction is extended from 5:00 p.m. on December 16, 2016, to **5:00 p.m. on February 15, 2017**;
3. The preliminary injunction hearing is hereby rescheduled from December 21, 2016, at 11:00 a.m. until the following date and time: _____

4. On Defendants' consent, the expiration date of the Temporary Restraining Order granted by the Court is extended until the Court's ruling on the pending preliminary injunction application, with all parties' claims and defenses preserved.

5. Entry of a Revised Scheduling Order does not prevent the parties from agreeing with the United States as to the entry of a Preliminary Injunction as to one or more of them prior to the Court's ruling on the preliminary injunction application.

6. The deadline for responses to the Complaint in this action is extended from December 18, 2016, to **February 17, 2017**.

A proposed Revised Scheduling Order is attached. Thank you in advance for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Vera M. Kachnowski', with a stylized flourish at the end.

Vera M. Kachnowski [VK-0904]

cc: All counsel via email and ECF
(Encl.)